

Aventure Communication Technology, LLC

Presentation to Office of Strategic Planning and Policy Analysis Federal Communications Commission

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Arent Fox

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Company Overview

➤ Aventure Communication Technology, LLC:

- Has deployed Wi-MAX-based wireless broadband networks in farming communities in Northwest Iowa.
- 220 residential and business customers of local and long distance telephone service and Internet.
- Provides full-service VoIP telephone service and hosted IP-PBX functions on a regulated basis.
- Provides wireless broadband Internet access ubiquitously across its networks.
 - 1 Mbps to residential users, 2 Mbps to business users – fully synchronous.
- Aggressive business plan called for construction of 5 networks in Iowa, South Dakota, Nebraska – delayed because of IXC campaign of self-help refusals to pay access charges.

Company Overview (cont'd)

- **Aventure is not a WISP.**
- **Aventure is not a Clearwire clone.**
- **Aventure provides full-service Hosted IP-PBX service and multi-megabit, synchronous Internet access.**
 - 1.5 Mbps to residential customers, 2 Mbps to businesses.
 - Applying for a Stimulus-funded plan that would offer much higher bandwidth – speeds of 5-10 Mbps.

The Aventure Technology

- **Uses “non-exclusive licensed” bandwidth in the 3.65 - 3.7 MHz band.**
- **Redline Radios (Canadian manufacturer).**
 - Contention-based protocols.
 - WiMAX 802-16(e)
- **System-wide 25 Mbps throughput.**

Nexus of Broadband and POTS

- **Aventure is a telephone company that provides broadband services.**
- **It has ETC status, and receives USF funding.**
- **Aventure's telephone services "subsidize" its broadband services.**
- **The Commission must include telephony issues in promoting broadband.**

Telephony/Broadband Issues

- **Radio locations not given the same status as telco switch locations in terms of entry into the LERG for routing purposes.**
- **Outdated notions of telecom network architecture are a problem:**
 - Current litigation pits Aventure against IXC's who argue that a LEC must have "local switches," define its "local service area" like ILECs, and collect SLCs.
 - These notions are irrelevant – Aventure would prefer to have an extensive non-toll local calling area, and has no intention of following ILEC LATAs or local exchange boundaries.

Telephony/Broadband Issues (cont'd)

- **The FCC should provide ETC designations for broadband wireless providers.**
 - FCC has asserted exclusive jurisdiction over VoIP, 3.65 GHz spectrum, and wireless broadband.
 - Aventure is deploying in the tri-state area around Sioux City (S.D., IA., NE.) – FCC designation would facilitate this deployment.
 - Aventure is a competitive LEC who competes against independent ILECs and CLECs. State regulators are often hesitant to promote competition in this area.
 - The Iowa Utilities Board recently issued an order highly biased against rural LECs, and patently favoring Qwest. Qwest may have “veto power” over future ETC designations by the Board in that state.